

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

REPLY ALL CORP.

Plaintiff

v.

GIMLET MEDIA, INC.

Defendant

1:15-cv-04950-WFK-PK

Date of service: April 2, 2025

**NOTICE OF DEFENDANT-JUDGMENT CREDITOR'S  
MOTION TO EXTEND DURATION OF EXECUTION LEVY**

PLEASE TAKE NOTICE that the above-named defendant-judgment creditor moves this Court before the Honorable William F. Kuntz, II at the United States Courthouse, 255 Cadman Plaza East, Brooklyn, NY 11201, for an Order extending, pursuant to CPLR 5232(a), the duration of its execution levy on:

- (a) all property not capable of delivery in which Balestriere PLLC d/b/a Balestriere Fariello ("Balestriere PLLC") is known or believed to have an interest in possession or custody of nonparties Howard Rubin and ("Rubin") and Brittany Hassen ("Hassen"), including Hassen's interest in and right to payment on account of the amended judgment (Rubin Action ECF [#467](#), "Amended Rubin Judgment") entered in Lawson et al v. Rubin et al E.D.N.Y. 17-cv-06404-BMC ("Rubin Action"), and
- (b) all debts of Rubin and Hassen to Balestriere PLLC, including those specified in the notices attached to the respective executions served upon them, namely, debt resulting from the [Amended Rubin Judgment](#), including attorneys' fees and costs awarded thereunder, and Balestriere PLLC's engagement terms (Rubin Action ECF [#453-1](#) ¶42, [#453-2](#)),

until sixty (60) days after the Second Circuit has issued an opinion, decision, judgment or order determining Rubin's appeal of the underlying judgment entered against him in the Rubin Action, which appeal is scheduled to be argued April 8, 2025 (2d Cir. Case 24-2018 ECF [#81.1](#)), or

alternatively until October 31, 2025; and for such other and further relief as the Court deems just and proper.

Dated: New York, NY  
April 2, 2025

Amini LLC

/s/ Jeffrey Chubak  
Jeffrey Chubak  
131 West 35th Street  
12th Floor  
New York, NY 10001  
(212) 490-4700  
[jchubak@aminillc.com](mailto:jchubak@aminillc.com)  
Attorneys for Defendant-Judgment Creditor